# UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

Case No. 09-06437 (ESL-11)

# IN RE:

# CARLOS L. BELTRAN RODRIGUEZ, ET AL.

#### **Debtors**

# **MOTION TO COMPEL**

# TO THE HONORABLE COURT:

COMES NOW, Chevron Puerto Rico LLC, formerly known as Texaco Puerto Rico, LLC and Texaco Puerto Rico, Inc. ("Chevron"), a party in interest, through the undersigned attorney respectfully STATES, ALLEGES and PRAYS as follows:

- 1. On May 17, 2011, Chevron finally received the keys to the Vega Baja service station as ordered by the Court. *See* Docket No. 336.
- 2. Upon inspection of the property, Chevron hereby notifies the court that some of its property is missing, specifically:
  - a) Large TEXACO sign (used to be in the post)
  - b) TEXACO letters (2 sets that are 30" and illuminate)
  - c) TEXACO logo (1 set that is 33" and illuminates)
  - d) Compressor

e) Gilbarco Electric Console

f) Dispensers

g) Lids of the Underground Storage Tanks

3. Therefore, Chevron moves to compel debtor and/or Ch. 11 trustee to

return its property as detailed above.

WHEREFORE, it is respectfully prayed that this Honorable Court enter an Order

as requested above, and for such other and further relief as this Honorable Court deems

just and proper.

I hereby certify that on June 20, 2011, I electronically filed the foregoing with the

Clerk of the Court using the CM/ECF system which will send notification of such filing

to the CM/ECF participants, the U.S. Trustee's Office, and the Ch. 11 trustee.

RESPECTFULLY SUBMITTED, in the city of San Juan, Puerto Rico, this 20th day

of June, 2011.

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